Region 3 GPRA Baseline RCRA Corrective Action Facility

VDOT Culpeper

1601 Orange Road Culpeper, Virginia 22701 Congressional District 7 EPA ID #: VAD980715064 Updated January 4, 2008

Current RCRA CA Activities

The Virginia Department of Environmental Quality (DEQ) is the lead agency for oversight of RCRA Corrective Action (CA) work at the facility. The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of a Post-Closure Care Permit (Permit) issued to the facility.

On September 14, 2005, the facility was issued a Hazardous Waste Management Post-Closure Care Permit (Permit), which includes site-wide CA requirements of the Hazardous and Solid Waste Amendments (HSWA) of the Resource Conservation and Recovery Act (RCRA) of 1984.

In July of 1996, the DEQ and the Virginia Department of Transportation (VDOT) initially entered into a Compliance Agreement with the facility for the site to comply with the requirements of the RCRA. The Compliance Agreement outlined the facility's regulatory obligations associated with three solid waste management units (SWMUs) identified at the facility. The three SWMUs identified in the Compliance Agreement have historically been referred to as the Sign Shop Vat, the Paint Pit, and the Hot Vat Stripper Ditch. The above SWMUs are no longer operating at the facility. The Closure Report for the facility's above SWMUs indicated that the Hot Vat Stripper Ditch did not adversely impact soil or groundwater and is; therefore, not included in the facility's Post-Closure Care Permit.

The facility's Permit requires the facility to conduct a RCRA Facility Investigation (RFI) for potential releases of hazardous waste and/or hazardous constituents at specified SWMUs and Areas of Concern (AOCs) identified at the facility. The RFI will be performed under two phases, a Phase I RFI and a Phase II RFI. The purpose of the Phase I RFI Report is to provide a preliminary assessment and results of the investigations regarding the nature and extent of potential releases from SWMUs and AOCs, to screen SWMUs and AOCs from further investigation, to focus the Phase II RFI, and to determine whether interim/stabilization measures (IMs) are necessary.

The facility submitted a Phase I RCRA RFI Work Plan (RFI Work Plan) to the DEQ and the EPA Region III in July 2006. The DEQ reviewed the RFI Work Plan and issued a Notice of Deficiency (NOD), dated January 4, 2007.

The facility submitted a response to the DEQ's Phase I RFI Work Plan NOD letter by correspondence, dated April 6, 2007.

On June 13, 2007, the DEQ issued conditional approval of the Phase I RFI Work Plan. The facility submitted revisions to the Phase I RFI Work Plan by letter, dated June 28, 2007.

On August 24, 2007, the DEQ approved the revised Phase I RFI Work Plan, which addressed the items of the conditional approval, and which included taking additional soil samples, installing additional groundwater sampling points, and removing additional soil.

The facility submitted a Community Relations Plan (CRP) and Fact Sheet to the DEQ and the EPA Region III in October 2007. The DEQ reviewed the CRP and issued conditional approval of the CRP in a letter, dated December 13, 2007.

Site Description

The VDOT Culpeper District Headquarters is located on a 52.8-acre parcel of land on US Route 15 Business, in the southern portion of the incorporated limits of the Town of Culpeper. The topography varies, with the land sloping primarily to the North and East. Since the late 1930's various activities have been conducted at the facility site including storage/maintenance of VDOT vehicles, storage of materials, used sign refurbishing, and various administrative/dispatch services.

RCRA CA Milestones

To date the following RCRA CA milestones have been completed at this facility:

- The Phase I RFI Work Plan, dated July 7, 2006, was submitted to the DEQ. The above Work Plan proposed to collect samples at two SWMU locations: SWMU No. 8, the Former Salvage Metal and Debris Storage Site (FSMDSS) and SWMU No. 10, the Suspect Waste Disposal Area (SWDA).
- The DEQ requested additional groundwater sampling prior to elimination of SWMUs Nos. 1 through 7 from the RFI process and elimination of SWMU No. 9, Former Equipment and Battery Storage Area (FEBSA), from the Phase I RFI.
- The facility submitted a Phase I RCRA RFI Work Plan to the DEQ and the EPA Region III in July 2006.

- The DEQ issued conditional approval of the RFI Work Plan on June 13, 2007. The facility submitted revisions to the Phase I RFI Work Plan by letter, dated June 28, 2007.
- On August 24, 2007 the DEQ approved the revised Phase I RFI Work Plan, which addressed
 the items of the conditional approval, which included taking additional soil samples, installing
 additional groundwater sampling points, and removing additional soil.
- The facility submitted a Community Relations Plan (CRP) and Fact Sheet to the DEQ and the EPA Region III in October 2007. The DEQ reviewed the CRP and issued conditional approval of the CRP in a letter, dated December 13, 2007.

Details and supporting documentation can be obtained by reviewing the files at DEQ's Central Office or by contacting the project managers identified in this Fact Sheet.

Environmental Indicator Status

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address high priority RCRA Corrective Action facilities by the year 2008. EPA is evaluating two key Environmental Indicators (EIs) for each facility: Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control. This facility is one of EPA Region III's high priority facilities and falls under this initiative.

Virginia's current evaluation of Environmental Indicators for this facility is as follows:

- Current Human Exposures Under Control Determination: The DEQ has made the EI determination of "yes, current human exposures are under control." The above determination is based upon the DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, CA 725, dated September 27, 2006. This above HHEI determination is considered current, effective January 4, 2008.
- *Migration of Contaminated Groundwater Under Control Determination:* The Migration of Contaminated Groundwater Under Control Determination has not been made to date.

Contaminants

The primary contaminants of concern in soil and groundwater are 1,2-dichloropropane and chlorinated solvents.

Institutional Controls

VDOT Culpeper Headquarters EPA ID No. VAD980715064 January 4, 2008 RCRA CA Fact Sheet Page 4 of 5

A Post-Closure Care Permit with the RCRA CA Module and Attachments was issued by the DEQ for the facility site on September 14, 2005. The Permit has an expiration date of September 14, 2015. The above Permit requires post-closure care, groundwater monitoring, and site-wide CA requirements. The post-closure care groundwater monitoring period for the site is to be 30 years from the Permit issuance effective date.

The former land based units were clean closed for soils; therefore, no deed restrictions were required for the former land based units.

Community Involvement

Citizens' questions and concerns may be directed to the contact below. Also, the Administrative Record which contains all documents and information regarding the RCRA CA program for this facility is available for public review at the following location:

Virginia Department of Environmental Quality 629 East Main Street Richmond, Virginia 23219 Phone: (804) 698-4131

Contact: Trisha Johnson

The DEQ also maintains a facility mailing list that is used to inform the public of substantial issues and permit administrative actions regarding the facility.

Government Contacts

The Commonwealth of Virginia DEQ is the lead CA regulatory authority for this project. Please contact the DEQ project manager listed below for details on this project or the contents of this fact sheet.

DEQ Project Manager

Trisha Johnson Virginia Department of Environmental Quality 629 East Main Street P.O. Box 1105 Richmond, VA 23218

Phone: (804) 698-4131 Fax: (804) 698-4237 Email: tbjohnson@deq.virginia.gov

EPA Project Manager

Mr. Mike Jocobi – 3WC23 U. S. Region III Virginia Department of Environmental Quality 1650 Arch Street Philadelphia, PA 19103-2029

Phone: (215) 814-3435 Email: Jocobi.mike@epa.gov

For more information about the EPA corrective action program, including Environmental Indicators, please visit the EPA web site at: www.epa.gov/reg3wcmd/correctiveaction.htm

Facility Contact

The facility contact is:

Mr. Ed Wallingford Virginia Department of Transportation Environmental Division 1401 East Broad Street Richmond, VA 23219

Phone: (804) 371-6824 Fax: (804) 371-6827

Email: e.wallingford@vdot.virginia.gov

Fact Sheet Updates

The previous Fact Sheet was updated July 2007. The next update is scheduled for July 2008. Previous Fact Sheets may be obtained through the DEQ contact.